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4
5 Attorneys for Plaintiffs Jamal Jackson; Jannie Mendez
(in Action No.4:08-cv-01916-SBA)

6
7 UNITED STATES DISTRICT COURT
8 FOR THE NORTHERN DISTRICT OF CALIFORNIA

9
10 This document relates to:
11 SHAWN MYERS; SARAH MYERS
Plaintiffs,

12 v.
13 CITY AND COUNTY OF SAN
FRANCISCO, et al.,
Defendants

16 JAMAL JACKSON; JANNIE MENDEZ,
17 Plaintiffs,

18 vs.

19 CITY AND COUNTY OF SAN
FRANCISCO, a municipal corporation;
20 HEATHER FONG, in her capacity as
Chief of Police for the CITY AND
COUNTY OF SAN FRANCISCO; JESSE
21 SERNA, individually, and in his capacity
as a police officer for the CITY AND
COUNTY OF SAN FRANCISCO; GARY
22 MORIYAMA, individually and in his
capacity as a police officer for the CITY
AND COUNTY OF SAN FRANCISCO;
23 and San Francisco police officers and
employees DOES 1 through 50, inclusive,
24 Defendants.

NO. C-08-01163 MEJ

DECLARATION OF ATTORNEY
FOR PLAINTIFFS REGARDING
EFFORT TO REACH A
STIPULATION TO RELATE in
connection with this
ADMINISTRATIVE MOTION TO
CONSIDER WHETHER CASES
SHOULD BE RELATED

[Civ. L.R. 3-12]

NO. 4:08-cv-01916-SBA

I, Robert C. Cheasty, am competent to testify and if called as a witness I would testify as set forth below:

- 1 1. I am admitted to the bar in California and before this court, and am the attorney for Plaintiffs
2 in this action known as *Jackson v. City and County of San Francisco*.
- 3 2. In compliance with the Local Rules I contacted the City Attorney's office to seek a stipulation
4 regarding the relating of this case, *JACKSON V. CITY AND COUNTY OF SAN FRANCISCO*,
5 with the earlier filed case involving the same parties and the same incident, the *MYERS V.*
6 *CITY AND COUNTY OF SAN FRANCISCO*.
- 7 3. I was directed to Sean Connolly as the Deputy City Attorney handling the *Jackson* case.
- 8 4. I explained that the parties, witnesses and issues in the *Myers* and *Jackson* cases arise from the
9 identical episode at the parking lot at San Francisco's wharf and the complaints and issues
10 were virtually the same, using much of the identical language and causes of action.
- 11 5. Mr. Connolly stated he was familiar with both the Myers and Jackson cases and stated that he
12 was representing the Defendants in both cases. He declined to stipulate to the relating of the
13 cases.
- 14 19
- 15 I declare under penalty of perjury that the above is true and correct and that I executed this
16 declaration under the laws of the State of California at my above office address on August 4, 2008.
- 17 20
- 18 21
- 19 22
- 20 23
- 21 24 /s/
22 _____
23 Robert C. Cheasty
24 Declarant, Attorneys For Plaintiffs
25 26
- 26 27
- 27 28

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